



FIRST CENTRUM CORPORATION

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FCC MAIL ROOM

September 9, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Re: Preemption of Local Zoning Regulation of Satellite Earth Stations, IB Docket No.
95-59 and Implementation of Section 207 of the Telecommunications Act of 1996, CS
Docket No. 96-83

Dear Mr. Caton:

We write in response to the FCC's Report and Order and Further Notice of Proposed Rulemaking released on August 6, 1996, which asks for comments "with regard to placement of antennas on common areas or rental properties, property not within the exclusive control of a person with an ownership interest, where a community association or landlord is legally responsible for maintenance and repair and can be liable for failure to perform its duties properly." We enclose six (6) copies of this letter, in addition to this original.

First Centrum Corporation is in the residential real estate business. We own 167 projects comprising over 7,000 apartment units in seven (7) states and the US Virgin Islands, as shown on the attached list. We serve approximately 15,000 renters.

Granting persons who do not have an ownership interest in the property they rent a presumptive right to install a satellite dish or to demand a community-based signal will adversely affect the conduct of our business without justification and needlessly raise additional legal issues. We question whether the Commission has the authority to require us to allow the physical invasion of our property. We must retain the authority to control the use of our property, for many reasons.

The FCC should not extend regulations implementing Section 207 of the Telecommunications Act of 1996 to situations in which the viewer does not have exclusive use or control and a direct ownership interest in the property where the antenna is to be installed, used and maintained. There are many factors such as safety, security, aesthetics, liability, and insurance costs that a private property owner must consider and manage on a day-to-day basis. All of these factors are vital to the operation of an apartment community and cannot be discounted or properly compensated for on a uniform basis.

The weight or wind resistance of a satellite and the quality of installation may create maintenance problems and -- more importantly -- a hazard to the safety of residents, building employees, and passers-by. Damage to the property caused by water seepage into the building interior, corrosion

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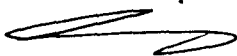
of metal mounts, or weakening of concrete could lead to safety hazards and very costly maintenance and repair. Slipshod or faulty contractors could create all kinds of safety problems. Even good installers cannot guarantee against weather damage.

The technical limitations of satellite technology create problems because all of our residents may not be able to receive certain services. It is our understanding that satellites are only positioned in certain areas, thus limiting access. And a community-type satellite dish or antenna mounted on the roof of our property is not necessarily the answer because of the great variation in condition and quality of roofs and it may be totally impractical and uneconomical to provide service to a small universe of potential subscribers.

In conclusion, we urge the FCC to avoid interfering in our relationships with our residents. All of the potential problems we cite will adversely affect the safety and security of our property as well as our bottom line and our property rights. Thank you for your attention to our concerns.

Very truly yours,

FIRST CENTRUM CORPORATION



Mark L. Weshinsky
President

MLW/sk

Enclosure

NAME	LOCATION		#
	CITY	STATE	UNITS
FOREST GROVE	RIVERVIEW	MI	150
FOREST GLEN AT SULLY STATION II	FAIRFAX COUNTY	VA	119
RIVER RUN AT PRINCE WILLIAM	WOODBIDGE	VA	200
MEADOWS OF AUBURN HILLS	AUBURN HILLS	MI	120
COURTHOUSE SQUARE	ANN ARBOR	MI	116
MEADOWS AT SALEM RUN	FREDERICKSBURG	VA	100
PARK MEADOW	GAYLORD	MI	80
FAIRVIEW RIDGE	NORMAL	IL	136
ALBANY SPRING	ALBANY	GA	80
FOREST GLEN AT SULLY STATION	FAIRFAX COUNTY	VA	119
CREEKSIDE AT TASKERS CHANCE	FREDERICK	MD	120
AUGUSTA SPRING	AUGUSTA	GA	100
BRACKEN WOODS	MIDLAND	MI	104
RIVERWALK MEADOWS	BAY CITY	MI	50
WESTMINSTER MEADOW	GRAND RAPIDS	MI	64
TWIN OAKS MEADOWS	LANSING	MI	63
LAKEVIEW MEADOWS II	BATTLE CREEK	MI	60
MEADOWS OF SOUTHGATE	SOUTHGATE	MI	83
COLONIAL MEADOWS	PONTIAC	MI	82
MEADOWS OF LIVONIA	LIVONIA	MI	166
UNIVERSITY MEADOWS	DETROIT	MI	53
LAKEVIEW MEADOWS	BATTLE CREEK	MI	53
JEFFERSON MEADOWS	DETROIT	MI	83
VIRGINIA PARK MEADOWS	DETROIT	MI	83
GRAND MEADOWS II	GRAND BLANC	MI	64
MEADOWCREST	SOUTHFIELD	MI	83
MAPLE BROOKE	KALAMAZOO	MI	64
WOODS OF WESTLAND	WESTLAND	MI	83
MONTICELLO	SOUTHFIELD	MI	106
STERLING MEADOWS	STERLING HEIGHTS	MI	83
BRETON MEADOWS	KENTWOOD	MI	101
GRAND MEADOWS I	GRAND BLANC	MI	101
LAFAYETTE PARK	PETOSKEY	MI	72

NAME	LOCATION		# UNITS
	CITY	STATE	
CEDAR TRACE	BROWN CITY	MI	16
NORTH PRAIRIE MANOR	PLAINWELL	MI	28
STONY GROUND VILLAS	CHRISTIANSTED	USVI	22
SHOWBOAT MANOR	CHESANING	MI	26
CARIB VILLAS IV	CHRISTIANSTED	USVI	24
CREEKSIDE MANOR	MATTAWAN	MI	24
CROSSWINDS MANOR	BELDING	MI	24
GRAND FORK MANOR	BEAVERTON	MI	24
MILL RACE MANOR	CENTREVILLE	MI	24
MYSTIC GROVE	COLON	MI	24
ROLLING BROOK III	ALGONAC	MI	26
ALPINE ALTEN ZIMMER III	GAYLORD	MI	24
CARIB VILLAS II	CHRISTIANSTED	USVI	20
CARIB VILLAS III	CHRISTIANSTED	USVI	24
LOGAN	LOGAN	OH	32
MEADOW GLEN	FOWLerville	MI	32
MEADOW RIDGE	MARLETTE	MI	24
PINE GROVE	KINGSFORD	MI	24
SARANAC GARDENS	SARANAC	MI	16
CANFIELD CROSSING	MILAN	MI	32
FAIRVIEW CROSSING	PLYMOUTH	WI	40
GRAND PRINCESS MANOR	CHRISTIANSTED	USVI	24
GRAND PRINCESS VILLAS	CHRISTIANSTED	USVI	24
LAKESIDE NHT	CADILLAC	MI	64
OAK HILLS	IONIA	MI	24
ORCHARD VIEW MANOR	GOBLES	MI	24
ROLLING BROOK II	ALGONAC	MI	24
VILLAGE COMMONS	LAWTON	MI	58
VINTAGE COURT	LAWTON	MI	24
WEXFORD MANOR	ONSTED	MI	24
WOOD HOLLOW	CENTREVILLE	MI	24
BIRCH LAKE NHT	LUDINGTON	MI	48
COUNTRY KNOLL	COLDWATER	MI	32
CRUZ BAY	CRUZ BAY	USVI	20

NAME	LOCATION		# UNITS
	CITY	STATE	
EDGEMONT	PORTLAND	MI	24
ELK RAPIDS II	ELK RAPIDS	MI	24
GREENWOOD	OWOSSO	MI	48
MANOR RIDGE	VASSAR	MI	32
SILVER CREEK	RIPON	WI	24
WESTCHASE	THREE RIVERS	MI	32
WHITEHILLS II	HOWELL	MI	24
WOOD CREEK MANOR	SAULT STE. MARIE	MI	32
WOODCLIFF	ISHPEMING	MI	24
BOARDMAN LAKE I	TRAVERSE CITY	MI	80
BOARDMAN LAKE II	TRAVERSE CITY	MI	32
CHARTERS COVE	ST. IGNACE	MI	24
HARBOUR OAKS	EAST CHINA TWP.	MI	32
TIMBER CREEK	NORTH BRANCH	MI	32
ALMA	ALMA	MI	32
AUTUMN GROVE	NEWAYGO	MI	24
BELLE RIVER COURT	MEMPHIS	MI	24
GLENCREST II	CAPAC	MI	16
GLENDALE NHT	SCOTTVILLE	MI	28
HARBOR LAKE	CHEBOYGAN	MI	32
INDIAN OAKS	TECUMSEH	MI	32
MANCHESTER	MANCHESTER	MI	32
MAYVILLE	MAYVILLE	MI	20
PINE KNOLL	GREENVILLE	MI	32
ROYAL OAK II	DURAND	MI	24
WEDGEWOOD	FREMONT	MI	20
WOOD CREEK	SAULT STE. MARIE	MI	48
ALPINE ALTEN ZIMMER II	GAYLORD	MI	24
BRITTON	BRITTON	MI	20
BROOKFIELD	BRONSON	MI	16
CASS CITY	CASS CITY	MI	24
CHANNEL VIEW II	MONTAGUE	MI	24
CHEBOYGAN SHORES	CHEBOYGAN	MI	24
COBBLE CREEK II	GRAYLING	MI	20
COUNTRYSIDE	PEWAMO	MI	16
HIDDEN GLEN	LAINGSBURG	MI	32
HIDDEN HOLLOW	COLUMBIAVILLE	MI	24
MAPLE TREE II	EAST TAWAS	MI	24
PARK COLONY	ITHACA	MI	24
PARKWAY PLACE	PORT SANILAC	MI	16
ROSEWOOD	SHELBY	MI	24
SUMMERVIEW	PENTWATER	MI	16
WESTBURY	WAYLAND	MI	32
CAMBRIDGE COURT	GREENVILLE	MI	32
CARLETON	CARLETON	MI	24
CEDAR SANDS	DOWAGIAC	MI	32
EVART PARK	EVART	MI	24
GLENWOOD	FOWLerville	MI	24
LAKEWOOD	SARANAC	MI	24

NAME	LOCATION		# UNITS
	CITY	STATE	
WHITEHILLS I	HOWELL	MI	24
WOODLAND	MILFORD	MI	24
YALE	YALE	MI	24
YORK HILLS II	MORENCI	MI	24
ADAIRSVILLE	ADAIRSVILLE	GA	24
COUNTRY GLEN	HOWELL	MI	32
HIGHLAND TERRACE	DUNDEE	MI	24
MEADOW HILLS NORTH	FREMONT	MI	48
OLDE MILL HEIGHTS	SAUGATUCK	MI	24
PARK TERRACE II	WILLIAMSTON	MI	32
PEARL LAKE	SHERIDAN	MI	16
PETERSBURG	PETERSBURG	MI	24
PLAZA TOWER	ALMONT	MI	24
RIVERCREST	CROSWELL	MI	24
ROLLING BROOK I	ALGONAC	MI	24
SEBEWAING TERRACE	SEBEWAING	MI	24
SHAW LANE	HOWARD CITY	MI	24
WHITE OAK	L'ANSE	MI	32
YORK HILLS I	MORENCI	MI	24
BELLEVUE	LESLIE	MI	32
CEDAR LANE	JEFFERSONVILLE	GA	32
CHANNEL VIEW I	MONTAGUE	MI	32
DONALSONVILLE	DONALSONVILLE	GA	32
ELK RAPIDS I	ELK RAPIDS	MI	24
GLENCREST I	CAPAC	MI	32
KNOLLVIEW	OVID	MI	28
LYONS	LYONS	GA	32
MAPLE TREE I	EAST TAWAS	MI	24
PERRINTON	PERRINTON	MI	12
PHEASANT BROOK	CLINTON	MI	28
PLEASANT VIEW	PIGEON	MI	16
WINDJAMMER	MUNISING	MI	24
BRIDGEVIEW	ST. IGNACE	MI	40
COBBLE CREEK I	GRAYLING	MI	32
CROOKED RIVER	ALANSON	MI	16
MAPLEVIEW	MAPLE RAPIDS	MI	24
RAINBOW FOREST	RAVENNA	MI	32
ROYAL OAK I	DURAND	MI	48
TANNAHILL	HARTFORD	MI	32

NAME	LOCATION		#
	CITY	STATE	UNITS
VIDALIA	VIDALIA	GA	48
ALPINE ALTEN ZIMMER I	GAYLORD	MI	46
BAYVIEW	FRANKFORT	MI	56
MEADOWRUN	MANCELONA	MI	16
ASPEN II	GAYLORD	MI	32
HILLCREST TERRACE	MANTON	MI	32
PARK TERRACE I NHT	WILLIAMSTON	MI	48
TRAVERSE WOODS II NHT	PETOSKEY	MI	80
CENTURY PLACE NHT	GREENVILLE	MI	96
TRAVERSE WOODS I NHT	PETOSKEY	MI	48
ASPEN I	GAYLORD	MI	48
LEXINGTON WOODS	CEDAR SPRINGS	MI	16